

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re: Luke W. Aaron and
Alisha M. Aaron, Debtors

Bankruptcy No.: 20-20180-CMB
Chapter 13

Luke W. Aaron and
Alisha M. Aaron, Movants

v.

Nationstar Mortgage LLC, d/b/a Mr. Cooper and
Ronda J. Winnecour, Chapter 13 Trustee, Respondents

DEBTORS' DECLARATION REGARDING MORTGAGE PAYMENT CHANGE

AND NOW, comes the Debtors/Respondents Luke W. Aaron and Alisha M. Aaron, by and through their counsel Michael S. Lazaroff, Esquire, and respectfully represent as follows:

1. Movant filed a *Notice of Mortgage Payment Change* at Claim 22 in the above captioned Chapter 13 case.
2. Debtors and undersigned counsel hereby declare that the existing Chapter 13 Plan is sufficient to fund the plan with the modified debt because Debtor Luke W. Aaron has filed, and the Court has granted, a Motion to increase the amount of his wage attachment to cover the increase.

Respectfully submitted,

/s/ Michael S. Lazaroff
Michael S. Lazaroff, Esquire
PA ID No. 204494

Law Office of Michael S. Lazaroff
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Counsel for Debtors

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CERTIFICATE OF SERVICE

I, Michael S. Lazaroff, Esquire, of 277 West Main Street, Saxonburg, PA 16056

CERTIFY:

That I am at least 18 years of age;

That on the 7th day of January, 2021, I served a copy of the *Debtors' Declaration Regarding Mortgage Payment Change* filed in this proceeding on:

Office of the U.S. Trustee
via CM/ECF e-mail noticing

Ronda Winnecour, Esquire
Chapter 13 Trustee
via CM/ECF noticing

Maria D. Miksich, Esq., Attorney for Movant
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106
via electronic mail to bkgroup@kmllawgroup.com

I certify under the penalty of perjury that the foregoing is true and correct.

Executed on: January 7, 2021

/s/ Michael S. Lazaroff
Michael S. Lazaroff, Esquire
PA ID No. 204494

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